

(see Paragraphs 5, 6, & 8). The Declaration further attests to the unexpected results achieved by the claimed invention (see Paragraph 9). Such Declaration fully rebuts the Examiner's position on obviousness.

As stated in the attached Declaration at Paragraph 11, neither reference teaches the combination of the carbon fibers and binder of the Michael reference in the laminate of the Arthurs reference to create a laminate having enhanced lamination strength as suggested by the Examiner. The Arthurs reference teaches the use of a grafted polyethylene or grafted polypropylene adhesive to provide the desired strength in a headliner. The Michael reference ('989) teaches that a variety of fibers and mixtures thereof may be used in a headliner. There is no teaching contained in either of the references that supports the combination proposed by the Examiner.

The express teachings of the references teach away from the combination proposed by the Examiner, because the combination of the references is just as likely to produce a variety of other composite combinations besides the claimed invention. A proper combination of the teachings of the Arthurs reference with the Michael ('989) reference would result in the fiberglass and adhesive of the Arthurs reference applied to the door skin of the Michael reference ('989). Further, the teachings of the Arthurs reference cannot be properly combined with the teachings of the Michael reference ('989), because there is no motivation for making such a combination in either reference.

Respectfully submitted,



Staci E. Schweikert
Reg. No. 52,200

MacMillan, Sobanski & Todd, LLC
One Maritime Plaza, Fifth Floor
720 Water Street
Toledo, Ohio 43604
(419) 255-5900